

Timothy C. Travelstead, Esq. (SBN 215260)
t.travelstead@narayantravelstead.com
Scott C. Ku, Esq. (SBN 314970)
s.ku@narayantravelstead.com
NARAYAN TRAVELSTEAD P.C.
7901 Stoneridge Drive, Suite 230
Pleasanton, CA 94588
Telephone: (650) 403-0150

Attorneys for Plaintiffs
HINDU AMERICAN FOUNDATION;
SAMIR KALRA; MIHIR MEGHANI;
SANGEETHA SHANKAR; DILIP AMIN; SUNDAR IYER;
RAMANA KOMPELLA; AND DOES ONE TO THREE

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

HINDU AMERICAN FOUNDATION, INC.,
a Florida Not For Profit Corporation; Samir
Kalra Mihir Meghani; Sangeetha Shankar;
Dilip Amin, Sundar Iyer, Ramana Kompella
as individuals; and Doe Plaintiffs One to
Three

Plaintiffs,

vs.

KEVIN KISH, an individual, in his official
capacity as Director of the California Civil
Rights Department; and DOES 1 - 50,
inclusive,

Defendants.

Case No. 2-22-CV-01656-DAD-JDP

**DECLARATION OF DOE THREE ISO
MOTION TO PROCEED UNDER
PSEUDONYM**

Date: November 21, 2023

Time: 1:30 p.m.

Judge: Dale A. Drodz

Date Action Filed: September 20, 2022

1 I, DOE THREE, declare as follows:

2 1. I am a person of South Asian descent and a practicing Hindu who works in the
3 technology sector and resides in California. There has been significant and controversial
4 publicity surrounding Hinduism and caste discrimination nationally and abroad.

5 2. I understand that the California Civil Rights Department has tried to define Hindu
6 beliefs and has defamed my religion by taking the position that the horrors of a caste system,
7 such as that compared to the discriminatory practices of slavery, is an inherent part of Hinduism.

8 3. The CRD has further falsely tied anyone practicing Hinduism to engaging in caste
9 discrimination. This is false, dismisses me as a person of South Asian descent practicing Hindu,
10 and makes me feel insignificant, little, and hopeless that I can possibly speak up for persons of
11 South Asian descent who practice Hindu without receiving retribution in return.

12 4. As a practicing Hindu, I believe only those who practice Hindu should be allowed
13 to define Hinduism. I know many Hindus who expressly disagree with the CRD's
14 characterization, and like me, they have told me that it has caused them significant harm in all
15 aspects.

16 5. In response to the CRD's actions, me, my employer, and my co-workers have
17 been required to address caste questions and issues which never arose before. The questions
18 directed at me, and persons I personally know of South Asian Descent practicing Hindu, have
19 been and continue to be extremely uncomfortable and awkward.

20 6. I have felt significant animosity directed at me because of the CRD's legally-
21 endorsed false presumption that I, as a Hindu, automatically practice caste-based discrimination
22 as part of my religion.

23 7. The CRD's representations have made me feel significant mental and spiritual
24 turmoil and have caused me anxiety. They have made me feel as if I should not be practicing

1 Hindu, which is expressly my right in this nation, and that if I wish to do so, then I will be
2 forever associated with the horrors of caste discrimination.

3 8. At work, I have been ostracized by those who simply feel that they should stay
4 away from anyone who looks like they are South Asian and/or practice Hindu because they do
5 not understand the difference and do not want to risk getting accused of harassment or
6 discrimination.

7 9. I and many others alike have received express hate on internal company social
8 media channels already, and expect that to continue. It is not only the express hate towards me
9 and those alike that causes me harm, but also the unspoken and unexpressed animus I feel
10 towards me and persons of South Asian descent and/or people who practice Hinduism.

11 10. I have had to repeatedly explain to people around me and defend that Hinduism
12 and caste are not one and the same, and that Hinduism expressly rejects caste as a belief. I
13 should not have to do this and feel embarrassment and anger each time I am approached by a
14 person who asks extremely uncomfortable and private questions about my heritage and religious
15 beliefs.

16 11. Rather than reduce negative stigmas against me, persons of South Asian descent,
17 and persons who practice Hindu, the CRD has instead highlighted this issue and created a
18 fragmented environment of fear and confusion.

19 12. If people know my personal information, I fear that they will try to harm or
20 retaliate against me or my family, either physically or in some other way. I also fear that the
21 CRD will come after me and/or interfere with my employer, resulting in permanent negative
22 reputational and economic harm to me or those in my family.

23 13. Internal discussions within the company resulted in racial profiling in general
24 discussion forums and internal sites, including questioning “the large number of Indian managers
within the company”, calling anyone opposing them to be “White Supremacists”.

1 14. DEI training that brings up caste as a topic brought up questions on how to
2 identify and profile the supposed caste of employees by their last names resulting in clear racial
3 profiling. Extra scrutiny is only reserved for those of the Indian race and Hindu religion,
4 exempting others from any equivalent sub-racial discriminatory categories such as ethnic groups,
5 tribal groups, ancestry, casta etc.

6
7 I declare under penalty of perjury under the laws of the United States that the above is
8 true and correct. Executed on September 25, 2023, at Saratoga, CA.

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10 /s/ DOE THREE
11 DOE THREE
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